

10-3-05

Charge Questions for SAB Workgroup Consultation on

Approach for Conducting Source Emission Characterization Tests of Open Burning of Vegetative and Demolition Debris

Introduction:

In the aftermath of Hurricane Katrina and Hurricane Rita, and the subsequent flooding, EPA has been asked by the Louisiana Department of Environmental Quality (LDEQ) to review their approach for addressing demolition and disposal of specific structures in Jefferson Parish, Orleans Parish, Plaquemines Parish and St. Bernard Parish. EPA intends to exercise its enforcement discretion and grant a no action assurance for demolition and disposal of asbestos-containing waste material in these parishes provided those activities are carried out in accordance with the LDEQ guidelines and the conditions set forth in a guidance document entitled “EPA’s Conditions for Granting a No Action Assurance and Associated Recommendations for LDEQ Asbestos Demolition and Disposal Procedures for Jefferson Parish, Orleans Parish, Plaquemines Parish and St. Bernard Parish in the Aftermath of Hurricane Katrina and Hurricane Rita” (Conditions and Recommendations Document). The conditions and recommendations were developed for the purpose of minimizing any potential adverse public health and environmental effects from the demolition and disposal activities. This no action assurance will extend for a period of six months from the date of the transmittal letter. Prior to the expiration date, the situation will be reviewed to determine if either the guidance or the no action assurance need to be modified or revoked.

Note that within the Conditions and Recommendations Document, the Air Curtain Destructor (ACD) section provides a process for ACD operating parameters to be determined through an approach described in Appendix B, entitled “Approach for Conducting Source Emission Characterization Tests of Open Burning of Vegetative and Demolition Debris.” We are interested in learning whether this approach will allow us to verify the effectiveness of this process in reducing potential risks from use of ACD technology. To this end, we are asking the Science Advisory Board to answer the following questions:

1. Open burning issues of concern

The approach identifies several issues of concern associated with open burning:

Failure of asbestos to be transformed into benign forms
Emissions of metals, particularly lead and mercury
Formation of halogenated organic compounds
Increased emissions of PM, including PM_{2.5}

Are these the situations that should most receive attention?

2. Parameters to be monitored

Are the parameters that are described adequate for developing operating guidance to ensure that future open burning activities are conducted in such a way to minimize adverse impacts on human health and the environment?

3. Pollutants to be measured

Given the broad range of compounds likely to be present in open burning of demolition debris, do the specific compounds listed describe an adequate range of pollutants to provide guidance on the performance of open burning systems?

4. Burn site monitoring – continuous monitoring or characterization monitoring

Is it sufficient to monitor an initial burn(s) to develop a characterization of potential releases rather than continuously monitoring each burn? How many burns should be monitored to develop the initial characterization necessary to determine the appropriate parameters?

5. Monitoring methods, equipment, and quality assurance activities

To the extent that EPA has been able to describe or reference the monitoring methods, equipment, and quality assurance activities in the document, are they appropriate? What advice do you have for EPA as we further develop the methods and equipment plans?